

EXHIBIT 1

Klenov, Michael

From: Klenov, Michael
Sent: Monday, March 30, 2015 2:19 PM
To: 'smerrill@sidley.com'
Cc: Gutzler, Greg; Elias, Rich; Spicer, Tami; 'Horowitz, David I.'; Bhimani, Jay; Rose, Kristin
Subject: RE: NCUA

Ms. Merrill:

I represent the National Credit Union Administration Board in a series of coordinated cases against RBS. Per the email below, I understand that you represent Mr. Whittemore. We plan to depose your client and wanted to reach out to (1) see whether you would accept service of a deposition notice/subpoena and (2) work with you on scheduling a mutually acceptable date.

If possible, we'd like to depose Mr. Whittemore in early May. Please let me know if you will accept service and whether specific dates/locations within that timeframe are more convenient than others. If you will not accept service, then I would appreciate it if you could let us know right away so that we can get the formal-service process started.

Thanks very much,

Michael

From: Horowitz, David I. [mailto:dhorowitz@kirkland.com]
Sent: Friday, March 27, 2015 12:33 PM
To: Klenov, Michael; Bhimani, Jay; Rose, Kristin
Cc: Gutzler, Greg; Elias, Rich; Shen, Andy; Berezney, Steve
Subject: RE: NCUA

Michael --

You should contact Shari Brandt at Richards Kibbe regarding Brian Farrell, Frank Camacho, and Paul Goudie. Her number is 212-530-1874 and her e-mail is sbrandt@rkollp.com. For William Gallagher and Frank Skibo: Colin Watson at Covington (212-841-1261, cpwatson@cov.com). For Jim Whittemore contact Susan Merrill at Sidley (212-839-8558; smerrill@sidley.com), and for Joe Walsh, Steven Glaser at Skadden (212-735-2465; steven.glaser@skadden.com). We will get back to you as soon as possible regarding Mr. Phillips.

Best Regards,

David

David I. Horowitz | Kirkland & Ellis LLP
333 S. Hope Street | Los Angeles, CA 90071
P 213.680.8374 | F 213.808.8074 | C 323.326.9210

From: Klenov, Michael [mailto:mklenov@KoreinTillery.com]
Sent: Friday, March 20, 2015 6:16 AM
To: Horowitz, David I.; Bhimani, Jay; Rose, Kristin
Cc: Gutzler, Greg; Elias, Rich; Shen, Andy; Berezney, Steve
Subject: FW: NCUA

David,

I write to request deposition dates for the eight witnesses identified below. Consistent with Andy's attached letter, we ask that five of these dates be before May 30. If NCUA chooses to depose up to two additional RBS witnesses, then it will identify those witnesses before May 22.

James Whittemore
Vinu Phillips
Francis Camacho
Brian Farrell
Frank Skibo
Paul Goudie
William Gallagher
Joseph Walsh

For the witnesses who are not current employees, please let us know immediately if you will not be representing them or if you are not authorized to accept service of a subpoena on their behalf. We'd like to have some dates on the calendar before the end of next week so that we don't have to needlessly chase down witnesses who you will ultimately represent in order to serve them with subpoenas.

Thanks,

Michael

Michael Klenov
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Direct: 314-450-4098

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From: Shen, Andrew C. [<mailto:ashen@khhte.com>]
Sent: Thursday, March 19, 2015 6:54 PM
To: EXTERNAL NCUA SDNY; 'William F. Alderman'; 'Barbara S. Steiner'
Subject: NCUA

Counsel,

Please see the attached letter.

Best regards,

Andy

Andrew C. Shen

Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.
1615 M Street, N.W.
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